

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF INDIANA

[This form is for non-prisoners to file a civil complaint. NEATLY print in ink (or type) your answers.]

FILED

03/25/2024 counter

U.S. DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
Chanda J. Berta, Clerk of Court

HEIDI DAVONNE BROWN

[You are the **PLAINTIFF**, print your full name on this line.]

v. SOUTH BEND

HOUSING AUTHORITY

[The **DEFENDANT** is who you are suing. Put ONE name on this line. List ALL defendants below, including this one.]

Case Number 3:24-cv-261

[For a new case in this court, leave blank.
The court will assign a case number.]

[The top of this page is the caption. Everything you file in this case must have the same caption. Once you know your case number, it is VERY IMPORTANT that you include it on everything you send to the court for this case. DO NOT send more than one copy of anything to the court.]

CIVIL COMPLAINT

#	Defendant's Name and Job Title	Address
1	[Put the defendant named in the caption in this box.] <u>SOUTH BEND HOUSING AUTHORITY</u>	<u>501 ALONZO WATSON DR.</u> <u>SOUTH BEND, IN 46601</u>
2	[Put the names of any other defendants in these boxes:]	
3		

[If you are suing more defendants, attach an additional page. Number each defendant. Put the name, job title, and address of each defendant in a separate box as shown here.]

- How many defendants are you suing? 1
- What is your address? 242 RUE FLAMBEAU Apt. 712
SOUTH BEND, IN 46615
- What is your telephone number: (574) 298 9315
- Have you ever sued anyone for these exact same claims?
☒ No.
☐ Yes, attached is a copy of the final judgment OR an additional sheet listing the court, case number, file date, judgment date, and result of the previous case(s).

[DO NOT write in the margins or on the back of any pages. Attach additional pages if necessary.]

CLAIMS and FACTS

DO: Write a short and plain statement telling what each defendant did wrong.

DO: Use simple English words and sentences.

DO NOT: Quote from cases or statutes, use legal terms, or make legal arguments.

DO: Explain when, where, why, and how these events happened.

DO: Include every fact necessary to explain your case and describe your injuries or damages.

DO: Number any documents you attach and refer to them by number in your complaint.

DO NOT: Include the names of minors, social security numbers, or dates of birth.

DO: Use each defendant's name every time you refer to that defendant.

DO: Number your paragraphs. *[The first paragraph has been numbered for you.]*

1. PLEASE SEE ATTACHED

Facts for informal Hearing: March 26th 2024 at 0900.

1. After initial briefing, initial contact was made with HCV Senior Specialist was made via walk in to receive voucher. Date unknown
2. **RTA and Move date (SEE ATTACHED EMAIL)**
 - a. ATTACHMENTS: EAP LANDLORD AFFIDAVIT
3. **Further Communication:**
 - A. **January 4th 2024 at 0630** regarding **Program Update**
 - B. **Informal Hearing Cancelled** dated February 20th at 0647
 - C. **Rental Issues NON payment and or Late Payments** dated December 2nd 2023 at 0847
 - D. **Heidi Brown**
4. **Communication regarding incorrect Subsidy amount:**
 - a. Initial Communication regarding Incorrect Rental Subsidy:
 1. **Rental Issues NON payment and or Late Payments** dated **December 2nd 2023 at 0847** (SEE 3.C)
 2. **August 2nd 2023 0708** regarding **UPDATE** see email reference dated **November 1st 1717**
 3. **November 2nd , 2023 at 1227** via email with Linda Brownlee
 - a. Attachments: Leger, Pay Clip (Method of Payment)
 4. **November 8th, 2023 at 0939** regarding utility allotment. **No attachments**
 5. **Walk-in** dated **December 15, 2023 at 1032** (SEE ATTACHED)
 6. **Notice or any correspondence** dated **December 18th, 2023 at 1143**, regarding mail fraud, previous discussed with Brownlee.
 7. **ACCEPTED: Housing INFORMAL HEARING REQUEST** dated **December 20th 2023 at 0652**
 8. **December 20th 2023 at 0947** Linda Brownlee accepted Gmail invite for Initial Informal Hearing dated **January 4th 2024 at 1500** see attachment from **Calendar**.
5. **Annual Recertification:**
 - a. **Initial Communication:**
 - b. **Informal Hearing: FOLLOW UP** (SEE ATTACHED) post initial Informal Hearing dated January 20th, 2024 at 1125.
 - c. POST Notice of Informal Hearing: **Portion Unpaid**, dated **February 7, 2024 at 1525**
 - d. **HEARING APPOINTMENT LETTER** dated **January 22, 2024 at 0750**.
 1. Informal Hearing NOTICE dated **January 16th 2024** for **February 6th, 2024 at 1100**.
 2. **Informal Hearing Cancelled** dated February 20th at 0647 (SEE 3.B)

3. **Reschedule of Informal Hearing** dated **March 5th, 2024 at 1829**
4. **Informal Hearing Notification** dated **March 18th, 2024** for **March 26th 0900**
- e. **Informal Hearing Response** dated March 7th at 1634
6. **Initial Income REQUEST:** dated December 6th 1621 via email (SEE EMAIL titled **RENT FORM**)
 - a. ATTACHMENTS:
 - b. INTERIM CHANGE dated JUNE 19th 2023,
 - c. Letter from IRS
 - d. Notice of Security Incident
 - e. Initial RESEA Notification Letter dated December 27, 2022
 - f. Application for an Identity Protection Personal Identification Number (IP PIN), IRS help information sheet.
 - g. Form 8822 Change of Address (indicating issues with Mail)
 - h. Handwritten letter from WorkOne manager
7. HUD Fair Housing Complaint

Claims and Facts (continued)

PLEASE SEE ATTACHED

PRIOR LAWSUITS – Have you ever sued anyone for this exact same event?

☒ No.

☐ Yes, attached is a copy of the final judgment OR an additional sheet listing the court, case number, file date, judgment date, and result of the previous case(s).

RELIEF – If you win this case, what do you want the court to order the defendant to do?

PLEASE SEE ATTACHED

FILING FEE – Are you paying the filing fee?

☒ Yes, I am paying the \$405.00 filing fee. I understand that I am responsible to notify the defendant about this case as required by Federal Rule of Civil Procedure 4. [If you want the clerk to sign and seal a summons, you need to prepare the summons and submit it to the clerk.]

☒ No, I am filing a Motion to Proceed In Forma Pauperis and asking the court to notify the defendant about this case.

[Initial Each Statement]

MB I will keep a copy of this complaint for my records.

MB I will promptly notify the court of any change of address.

MB I declare under penalty of perjury that the statements in this complaint are true.

Eric Brown
Signature

3/25/2024
Date

Should I be granted relief I would request monies and monetary gains for damages, losses, and protection from any means of retaliation current and possible ongoing. I would seek the relief in the amount of \$975,700 and an additional 255,000 for an average typical home in the state of Indiana.